

Remarks/Arguments

In the Office Action mailed on May 14, 2007, the Examiner objected to the disclosure due to informalities. The Examiner rejected claims 1, 5-11 and 15-20 under 35 U.S.C. §102(e) as unpatentable over Ryan et al. (U.S. Patent No. 6,559,979 B1). The Examiner rejected claims 2-4 and 13-14 under 35 U.S.C. §103(a) as unpatentable over Ryan in view of Camara (U.S. Patent No. 6,938,261 B2). The Examiner rejected claim 12 under 35 U.S.C. §103(a) as unpatentable over Ryan in view of Anwar (U.S. Patent Application Publication No. 2001/0042078 A1).

Applicants respectfully traverse the rejections and request reconsideration and withdrawal thereof. Applicants amended claim 1 to incorporate the limitations of claim 2, and cancelled claim 2. Applicants made similar amendments to claims 13 and 15. Applicants amended claims 18, 19 and 20 to enumerate the types of business application interfaces on the multifunction device. Support for this amendment may be found in paragraph 0035 of the specification.

Objection to the Specification

The Examiner objected to the specification because claim 13 recites “What is claimed is:”, which the Examiner stated should be included at the beginning of page 14 with the first page of the claims. Applicants have amended claim 13 to remove the phrase “What is claimed is:”, and have amended page 14 to incorporate this phrase at the beginning of the claims.

35 U.S.C. §102(e) and 35 U.S.C. §103(a) Rejections of Claims 1 and 3-17

The Examiner rejected claims 1, 5-11 and 15-17 under 35 U.S.C. §102(e) as unpatentable over Ryan, rejected claims 2-4 and 13-14 under 35 U.S.C. §103(a) as unpatentable over Ryan in view of Camara, and rejected claim 12 under 35 U.S.C. §103(a) as unpatentable over Ryan in view of Anwar. Applicants respectfully traverse these rejections, as none of the prior art of record, considered individually, or in any combination, teaches or reasonably suggests the multifunction devices or systems of the amended claims. The rejections will be discussed in regard to amended independent claim 1.

Amended independent claim 1 recites a standalone multifunction device comprising a modifiable user interface module configured to adapt to a plurality of business application

interfaces, an input device incorporating a graphical user interface, a source interface module configured to receive input data from at least one document data source, a target interface module configured to output processed document data, and a scriptable script engine module configured to control the operation of the standalone multifunction device and interface with a business application interface. The scriptable script engine on the multifunction device allows a user to integrate specific business applications interfaces to configure the multifunction device to operate specific business applications on the multifunction device, such as programs designed for payroll, contracting, expense accounting and human resources management. Thus, the scriptable script engine module allows the multifunction device to become highly customizable to the needs of a business operation.

At least one limitation of amended independent claim 1 not taught or reasonably suggested by any of the prior art of record, considered individually, or in any combination, is “a scriptable script engine module configured to control the operation of the standalone multifunction device and interface with a business application interface.” The limitation was originally included in claim 2 (now cancelled), and was rejected by the Examiner under the combination of Ryan and Camara. However, Applicants submit that Ryan and Camara does not teach or reasonably suggest this limitation.

The Examiner stated that Ryan does not teach a scriptable script engine module, but stated that Camara does teach a scriptable script engine module as recited by claim 1. The Examiner cites to col. 4, lines 31-50 of Camara as teaching the scriptable script module which is on the multifunction device recited by claim 1. However, Camara teaches a script-based device driver 62 (operating on a host system attached to a multifunction device) for controlling the operation of a hardware device 64 (see col. 4, lines 31-50 of Camara as cited by the Examiner). The script-based device driver 66 of Camara allows a manufacturer of a hardware device 64 to implement the driver for the hardware device 64 that operates on the operating system 76 of a host system as a driver script 70 instead of a normal device driver 98 (see col. 4, lines 32-50). This allows simplicity of implementing a driver for a hardware device 64 of Camara on a host system. Scripting driver 66 of Camara parses driver script 70 to control communications with hardware device 64 (see col. 4, lines 61-64 of Camara).

By contrast, the scriptable script module of the present claims is an element of the multifunction device, and not operating on a host system attached to the multifunction device.

Further, the scriptable script engine module serves a different purpose than the scripting driver 66 of Camara. The scriptable script engine module of the present claims allows the multifunction device to be configured to interface with a business application. These business application interfaces can be loaded onto the multifunction device and can operate without a host system. On the other hand, the scripting driver 66 of Camara allows a developer to control the communication between an operating system 76 (e.g., a host system) and a hardware driver 64 (see col. 4, lines 32-60). Thus, the scripting driver 66 of Camara is not equivalent to the scriptable script module of amended independent claim 1.

Further, there is no suggestion that scripting driver 66 of Camara can be implemented on a multifunction device. It would not make sense to implement scripting driver 66 of Camara on a multifunction device, as the scripting driver 66 controls communications from operating system 76 to a hardware driver 64. Further, there is no suggestion that scripting driver 66 of Camara can interface with business application interfaces loaded onto a multifunction device.

For at least these reasons, Applicants submit that the combination of Ryan and Camara, or any of the prior art of record, considered individually, or in any combination, does not teach the multifunction device of amended independent claim 1. These same arguments also apply to amended independent claims 13 and 15. These same arguments also apply to dependent claims 3-12, 14 and 16-17. Additionally, dependent claims 3-12, 14 and 16-17 recite additional limitations not taught or reasonably suggested by the prior art of record, considered individually, or in any combination. Thus, Applicants respectfully request reconsideration and withdrawal of the rejections of claims 1 and 3-17.

35 U.S.C. §102(e) Rejections of Claims 18-20

The Examiner rejected claims 18-20 under 35 U.S.C. §102(e) as unpatentable over Ryan. Applicants respectfully traverse the Examiner's rejections, because Ryan, or any of the prior art of record, considered individually, or in any combination, does not teach the method, computer readable medium and apparatus of claims 18-20. The rejections will be discussed in regard to amended independent claim 18.

Amended independent claim 18 recites a method for multifunction device document management. The method comprises interfacing with a business application interface on the multifunction device, wherein the business application interface is one of a payroll application,

an expense application and a human resource application, receiving user information, inputting document data, and submitting document data to the business application.

At least one limitation of claim 18 not taught or reasonably suggested by Ryan is “interfacing with a business application interface on the multifunction device, wherein the business application interface is one of a payroll application, an expense application and a human resource application”. The Examiner stated that Ryan teaches interfacing with a business application interface at column 5, lines 17-28. However, Ryan does not teach that the business application interface is a payroll application, an expense application or a human resource application.

Rather, Ryan teaches that a multifunction device can be programmed to perform various standard multifunction device functions for a particular user in a specified order. For example, Ryan discloses that one function can send a fax of a document to a specific number, then print xx copies of the document, and scan the document and send the image to a specific computer (see col. 5, lines 48-58 of Ryan). These three steps are considered to be one preprogrammed function of Ryan available for use by a specific user. These functions are just standard functions of a multifunction device performed in a specific order for a user with the press of a single button. Thus, the user doesn’t have to enter commands to perform all of the three operations every time they would like to perform this function. However, Ryan does not teach or reasonably suggest business application interfaces, such as recited by claim 18, which are more than just standard multifunction device operations.

Therefore, Applicants submit that Ryan, or any of the prior art of record, considered individually, or in any combination, does not teach the method of amended independent claim 18. These same arguments also apply to amended independent claims 19 and 20. Thus, Applicants respectfully request reconsideration and withdrawal of the rejections of claims 18-20.

Conclusion

Applicants maintain that all amended independent claims 1, 13, 15 and 18-20 are inventively distinguishable from all prior art of record (considered individually or in any combination) for at least the above discussed reasons. Further, dependent claims 3-12, 14 and 16-17 are allowable for at least the same reasons and as depending from allowable base claims. Still further, dependent claims 3-12, 14 and 16-17 recite additional limitations not disclosed by

the prior art. Applicants therefore respectfully request reconsideration and withdrawal of the objections and rejections and passage of the case to allowance.

Respectfully submitted,

Date: July 11, 2007

/Max S. Gratton/

Max S. Gratton (Reg. No 56,541)
Duft, Bornsen & Fishman, LLP
1526 Spruce Street, Suite 302
Boulder, CO 80302
(303) 786-7687
(303) 786-7691 (fax)